

COUNTY OF EL DORADO

DEPARTMENT OF TRANSPORTATION



EQUIPMENT MAINTENANCE DIVISION
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KENT C. TAYLOR
Equipment Maintenance Supervisor



July 20, 2005

California Air Resources Board
Mobile Source Control Division
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Hebert:

Subject: Ideas on Off-Road Diesel measure

Thank you for meeting with me at the Off-road In Use Mobile Equipment Control Measure workshop on July 19, 2005. I think some good things were discussed, and I appreciate the ARB's efforts to include the Department of Transportation in this process. At your request, I have documented some of the ideas we discussed at our meeting.

- Offer incentives to dispose of non-compliant engines and aging equipment. Incentives to dispose of non-compliant engines and aging equipment, either monetary or in the form of an extension of compliance deadlines, would offer agencies the opportunity to consider the more expensive option of disposing of equipment instead of retrofitting engines to meet diesel particulate matter reduction requirements.
- Offer a "good faith effort credit." As a government entity, we have no way to raise "extra" money to comply with expensive equipment replacement and engine retrofit programs. An extension of the deadline to comply would allow such entities the time to retire vehicles and spread the expense of compliance over a longer period. An entity could be considered eligible for a "good faith" credit based on their compliance schedule and performance compared to the schedule over a prescribed time period.
- Offer an "over achiever credit." A monetary credit or an extension of compliance deadlines would assist those entities that plan to exceed compliance standards in order to establish a cleaner fleet.
- Make Moyer funds more accessible. I suggest a simple rebate incentive, under which an entity would be eligible for a rebate for re-powering engines or purchasing and installing retrofit products. This would make it much simpler to access funds and result in wider spread use and compliance. I realize this idea will not work for every application, but may result in a greater number of older engines being retired from service.

- Reconsider the definition of on-road vehicle and off-road vehicle. I feel that the definition of an on-road vehicle versus an off-road vehicle has been all but ignored. I have asked for clarification on this definition at various meetings and workshops, and have yet to receive a definitive answer. I would like to suggest that the classification of a vehicle as on-road or off-road should be based the manufactures designed purpose for the machine and not the use by the operator. For example, the Department of Transportation uses motor graders to plow snow on the street. These machines are involved in an “emergency operation,” to remove snow from the street, to enable SAFER travel by the public. They are not used for commercial or transportation hauling. I feel they should be exempt from compliance with diesel particulate matter reduction standards due to the emergency nature of their use, or at least fall under the off-road “construction equipment” category based on their designed pupose.
- Reassess the definition of a low population for exemption of snow removal equipment. Finally, I think the ARB needs to take a harder look at the definition of a low population County in terms of exemption for snow removal equipment.

We are dedicated to the effort to improve air quality, because it improves the quality of life and preserves our resources. El Dorado County is one of the most beautiful and visited areas in California because of our diverse terrain of mountains and valleys, and as such, has certain heavy equipment requirements that are unique to the area.

Thank you for your time and consideration of the information provided in this letter. I look forward further discussion as we move close to implementation of the diesel particulate matter reduction requirements.

Sincerely,

Kent Taylor
Equipment Maintenance Supervisor

KT:mls

c: Kitty Martin
Dennis Milligin